

KIRK L. HANSEN
Mayor

BART CONLIN
President

BRENDA L. ERICKSON
Clerk-Treasurer

W. LEE GODFREY
Director of City Services

City of Soda Springs

County Seat and Commercial Center of
Caribou County
Founded May 20, 1863
9 West Second South - Phone 547-2600
SODA SPRINGS, IDAHO 83276

Councilmen

Wm. Bart Conlin
Mitchell J. Hart
Randall E. Prescott
T.M. Thomas

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Environmental Cleanup Office

November 22, 1996

Ms. Katherine Krueger
Environmental Protection Agency -- Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Krueger:

The comment period for EPA's decision on the Monsanto Soda Springs Superfund plan of action is now closed. Regardless of the option selected, however, it is in the City of Soda Springs' interest that a few protective principles should apply. These principles apply to implementation, and so I offer them now in advance for your consideration:

1. **The amount of farmland disrupted should be limited.** Soil remedies which disrupt farmland and which require excavation, heavy equipment usage, bulk transport through residential areas, etc., should be confined to only those locations where the risk assessment indicated a possible public health benefit -- that being those specific lots on which residential dwellings are built. Disruption of farmland carries with it its own risks to Soda Springs residents. Farmland disruption with no benefit is unacceptable.
2. **Premature farmland disruption should be avoided.** Soil remedies should not be imposed prematurely on the basis of land use speculation. There is no reason to "speculate" with the public health and safety of Soda Springs. Remedies to address residential scenarios should be applied prior to residential development, but no sooner.
3. **The above principles also apply to institutional controls.** While deed restrictions and easements do not have the same health and safety costs, they do have an economic cost to the local tax base. That is why such land use controls should not be more broad nor imposed sooner than is necessary to ensure public health and safety.

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By considering these principles in implementing any plan of action, the Superfund program may truly benefit our community's health and safety. Please be assured the City of Soda Springs stands ready to work jointly with you in achieving that goal.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk L. Hansen", with a long horizontal flourish extending to the right.

KIRK L. HANSEN

Mayor

cc: Tim Brincefield, EPA Project Manager
Bob Geddes, Monsanto Project Manager
Wallace E. Cory, IDEQ